

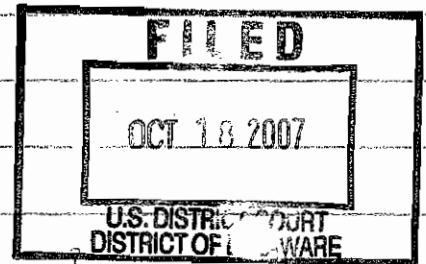
In The United States District Court
For The District of Delaware

James W. Riley,
Plaintiff,

v.

Stanley Taylor, et al.,
Defendants

C.A. No. # 06-01-GMS



Production of Documents

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Now Comes the plaintiff James W. Riley pursuant to Rule 34 of the F.R.C.P., for request that defendants' provide plaintiff with a copy of All medical records relating to visits he had with Delaware Correctional Center doctors on the dates listed below:

1. March 26, 2007 visit with Doctor Hamid regarding medical treatment for rectum dysfunction; examination by eye doctor and fulfillment of doctors' orders for orthopedics boots & sneakers;
2. April 17, 2007 visit with doctor who examined Riley's rectum problems and prescribed several over the counter medications;
3. May 4, 2007 visit from doctor Hamid on status of medical treatment and unfulfilled doctors' orders for the orthopedics boots;
4. May 8, 2007 visit with doctor who examined Riley's rectum and discovered a large lump inside

his rectum. Doctor ordered that Riley be re-examined by eye doctor for the previously prescribed faulty eyeglasses ;

5. June 22, 2007 visit with eye doctor who said Riley's eye vision could not be corrected ;

6. July 26, 2007 visit with doctor at which time Riley told doctor medication given for rectum dysfunction not helping problem or relieving suffering from painful swelling of rectum ;

7. August 27, 2007 visit with same doctor who again examined Riley's rectum and again Riley told doctor medications not helping painful swelling of rectum. This time doctor scheduled Riley to see a Specialist, but told Riley it will be a while before he actually get to see Specialist.

8. On January 21, 2007, Riley filed a request for Production of Documents which is attached hereto. Plaintiff Riley compel all defendants to produce the documents requested in the attached Rule 34 motion as part of the general production request herein within 30-days.

Wherefore, within 30-days of receipt of this request the defendants shall serve true and correct copies of the documents requested herein above.

Date: Oct. 15, 2007

James W. Riley
DeLa. Corr. Center
1181 Paddock Rd.
Smymrna, Dela. 19977

IN The United States District Court
For The District Of Delaware

James W. Riley,
Plaintiff

vs.

Stanley Taylor, et al.,
Defendants.

C. A. No. # 06-01-GMS

Rule 34

Production Of Documents

Now Comes the plaintiff James W. Riley pursuant to Rule 34 of the F.R.C.P herein below requests the following documents for trial and any potential appeal:

1. The attached newspaper article identify "Court documents obtained by The News Journal" and a "sworn deposition" recently given by defendant Stanley Taylor in a wrongful death lawsuit. Plaintiff direct the defendant Taylor or his attorney to provide copies of all documents, sworn statements and testimony given by defendant Taylor under oath at aforementioned deposition hearing and which were filed in court. These documents shall bear the date, time and location they were created and for what purpose they were utilized.

2. Provide plaintiff a complete copy of the recent settlement agreement made between defendant Taylor and The United States Department of Justice to improve prison medical health care.

3. Provide plaintiff with a complete copy of his medical records from 1995 to the present date. These medical records in the possession of the medical defendants contain pertinent information relating to when plaintiff originally fractured his right ankle in 1995 and had surgery followed by physical therapy. Also these records bear copies of the initial sick call complaint plaintiff filed with the medical staff in 2002 regarding his rectum dysfunction.

4. Provide plaintiff with a copy of defendants' Correctional Medical Services, Inc. (CMS) and First Correctional Medical, Inc. (FCM) insurance policy and name of their insurer's company. These documents shall reflect how much money CMS and FCM are insurer against for liability of lawsuits.

These documents will assist plaintiff with the prosecution of this civil action case at any potential trial or subsequent appeal.

Wherefore the defendants shall provide the requested information in full within 30-days of receipt of this motion.

Date: Jan. 21, 2007

James W. Riley
James W. Riley, pro se
Delaware Correctional Center
1181 Paddock Road
Smyrna, Delaware 19977

Defendant Stanley Taylor

Wed., Jan. 17, 2007

Deposition: Prison chief admits not eyeing care

Taylor estimates inmate deaths
at a fraction of actual totals

By LEE WILLIAMS and ESTEBAN PARRA
The News Journal

Correction Commissioner Stanley W. Taylor Jr. never personally investigated health care complaints lodged by inmates or their families; denied responsibility for overseeing the prison medical staff, and grossly understated the number of inmates who died during the latter part of his tenure, according to court documents obtained by The News Journal.

Taylor was recently deposed under oath, in one of the numerous wrongful death lawsuits filed against him, his department and the state, on behalf of an inmate who died in state custody.

Many more lawsuits are pending, attorneys say.

Lawmakers and civil rights advocates say the next person to head the Department of Correction should be more engaged, more concerned with inmate care, and more involved in the day-to-day operations of the department than Taylor, who ran the prison system for 11 years.

They hope former state Attorney General Carl C. Danberg, whose nomination to replace Taylor is to be debated today in the Senate, will be more accessible and accountable.

"I want a commissioner who is passionate, who has a keen sense of justice, who's hands-on without micromanaging," said state Sen. Karen E. Peterson, D-Stanton. "I want somebody who cares about human beings, who will



Stanley W. Taylor Jr. will retire Feb. 1 after 11 years as correction commissioner.

INSIDE

24-year-old inmate's death shocks his family. A9

Read News Journal series on prison health care and watch a video interview with defendant Taylor at www.delaware-online.com.